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10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

13 KIMBERLY HUDSON-BRYANT,
14 individually and on behalf of all others
15 similarly situated,

16 Plaintiffs,

17 v.

18 OCMBC, INC. dba LOANSTREAM,
19 PREMIER FINANCIAL MARKETING
20 LLC D/B/A RESMO LENDING, AND
21 SEAN ROBERTS

22 Defendants.

Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF ANDREW R.
PERRONG IN SUPPORT OF JOINT
MOTION AND STIPULATION TO
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: TBD

1 I, Andrew R. Perrong, declare:

2 1. I am an attorney at law admitted Pro Hac Vice to United States District
3 Court, Central District of California and am a principal with Perrong Law, LLC co-
4 counsel for Plaintiff Kimberly Hudson-Bryant in this action. I have personal
5 knowledge of the facts set forth in this declaration and I submit this declaration in
6 support of the Parties' Joint Motion and Stipulation to Continue Case Deadlines.

7 2. Plaintiff's husband is scheduled for surgery in early July 2025, however,
8 he is also on the wait list to have his surgery performed at an earlier date, on short
9 notice. Plaintiff intends to be at the hospital with her husband during the surgery, and
10 she will be his primary caregiver during his recuperation. Accordingly, Plaintiff will
11 be unavailable to participate in this lawsuit, including by providing her deposition,
12 and responding to written discovery requests during the pendency of her husband's
13 surgery and recuperation. This, combined with the unavailability of defendant
14 LoansStream's 30(b)(6) witness, will prevent the parties from completing discovery
15 within the current deadlines, which will also impact other existing deadlines such as
16 class certification and expert discovery.

17 3. For the reasons set forth herein, and to conserve time and judicial
18 resources, the Parties believe that a 90-day extension of all deadlines will allow the
19 Parties to properly complete discovery and prepare for trial.

20 I declare under penalty of perjury under the laws of the State of California that
21 the foregoing is true and correct, and that this declaration was executed on June 17,
22 2025, at Glendside, PA.

23 

24 _____
Andrew R. Perrong, Esq.